

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TOBIAS MOELLER-BERTRAM,  
individually, and on behalf of all others  
similarly situated,

Plaintiff,

v.

GEMINI TRUST COMPANY, LLC; and  
DIGITAL CURRENCY GROUP, INC.,

Defendants.

Case No. 1:23-cv-02027

Hon. Lewis J. Liman

**DECLARATION OF CAROLINE HICKEY ZALKA IN SUPPORT OF DIGITAL  
CURRENCY GROUP, INC.'S REPLY IN SUPPORT OF ITS MOTION TO TRANSFER  
TO THE DISTRICT OF CONNECTICUT**

I, Caroline Hickey Zalka, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm Weil, Gotshal & Manges LLP, 767 5th Avenue, New York, New York 10153, counsel to Defendant Digital Currency Group, Inc. I submit this declaration in further support of Digital Currency Group, Inc.'s Motion to Transfer to the District of Connecticut.

2. Attached hereto as Exhibit A is a true and correct copy of a securities class action amended complaint filed on March 17, 2023 in the United States District Court for the Southern District of New York, under the caption *Picha et. al v. Gemini Trust Company, LLC et. al*, 1:22-cv-10922-NRB (S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of the Master Digital Asset Loan Agreement executed between Genesis Global Capital, LLC, Gemini Trust Company, LLC, and Gemini Earn Program investors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of June 2023.

/s/ Caroline Hickey Zalka

Caroline Hickey Zalka